

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Case No. 21-cr-20749

Plaintiff,

v.

ADRIAN ALE CHAVARRIA,

Defendant.

SECOND SUPERSEDING INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

18 U.S.C. § 922(j); Possession of a Stolen Firearm

On or about March 23, 2020, in the Eastern District of Michigan, ADRIAN ALE CHAVARRIA, possessed a stolen firearm, which had been transported in interstate commerce, that is a Smith & Wesson, model 669, 9mm Luger caliber, semiautomatic pistol, and ADRIAN ALE CHAVARRIA then knew or had reasonable cause to believe the firearm was stolen, all in violation of Title 18, United States Code Section 922(j).

FORFEITURE ALLEGATION

18 U.S.C. §924(d); 28 U.S.C. §2461

The allegations contained in Count One of this Information are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. §924(d)(1) and 28 U.S.C. §2461. Upon conviction of the offense charged in Count One of this Information, ADRIAN ALE CHAVARRIA shall forfeit to the United States, any firearm and ammunition involved in or used in any knowing violation of 18 U.S.C. § 922 including but not limited to a Smith & Wesson, model 669, 9mm Luger caliber, semiautomatic pistol, serial number TAJ2412, one high-capacity magazine and 25 rounds of 9 millimeter ammunition.

Dated: January 13, 2023

DAWN N. ISON
Acting United States Attorney



NANCY A. ABRAHAM
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ANTHONY P. VANCE
Assistant United States Attorney
Chief, Branch Offices

Companion Case information MUST be completed by AUSA and initialedUnited States District Court
Eastern District of Michigan**Criminal Case Cover Sheet****Case Number**
21-cr-20749

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: NAA

Case Title: USA v. ADRIAN ALE CHAVARRIA**County where offense occurred:** Genesee County**Check One:** ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty** Indictment/ Information --- **no** prior complaint. Indictment/ Information --- based upon prior complaint [Case number:] Indictment/ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].**Superseding Case Information****Superseding to Case No:** 21-cr-20749**Judge:** Kumar

- ☐ Corrects errors; no additional charges or defendants.
- ☒ Involves, for plea purposes, different charges or adds counts.
- ☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name**Charges****Prior Complaint (if applicable)**

18 U.S.C. § 922(j); Possession of a Stolen Firearm

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

Date: January 13, 2023

s/Nancy A. Abraham

Nancy A. Abraham

Assistant United States Attorney

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Flint, MI 48502

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Attorney Bar #: P-42060

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.